

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
Nashville DIVISION

RECEIVED
OCT 25 2024
U.S. District Court
Middle District of TN

Mr. Jamie Bailey #00374857

(Name)

00374857

(Prison Id. No.)

(Name)

(Prison Id. No.)

Plaintiff(s)

v.

Core Civic

(Name)

(Name)

Defendant(s)

(List the names of all the plaintiffs filing
this lawsuit. Do not use "et al." Attach
additional sheets if necessary.)

Civil Action No. _____
(To be assigned by the Clerk's Office.
Do not write in this space.)

JURY TRIAL REQUESTED ___ YES ☒ NO

(List the names of all defendants
against whom you are filing this
lawsuit. Do you use "et al." Attach
additional sheets if necessary.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS FILED
PURSUANT TO 42 U.S.C. § 1983

I. PARTIES TO THIS LAWSUIT

A. Plaintiff(s) bringing this lawsuit:

1. Name of the first plaintiff: Mr. Jamie Bailey
Prison I.D. No. of the first plaintiff: 00374857
Address of the first plaintiff: Trousdale Turner Correctional Center
Unit C-C-111-A, 140 Marion Way, Hartsville, TN 37074-2080

Status of Plaintiff: CONVICTED (☒) PRETRIAL DETAINEE (___)

2. Name of the second plaintiff: _____
Prison I.D. No. of the second plaintiff: _____
Address of the second plaintiff: _____

Status of Plaintiff: CONVICTED (___) PRETRIAL DETAINEE (___)

(Include the name of the institution and mailing address with zip code for each plaintiff. If any plaintiff changes his or her address, he or she must notify the Court immediately. If there are more than two plaintiffs, list their names, prison identification numbers, and addresses on a separate sheet of paper.)

B. Defendant(s) against whom this lawsuit is being brought:

1. Name of the first defendant: Core Civic
 Place of employment of the first defendant: Owner of this
Penitentiary
 First defendant's address: 5501 Virginia Way, Suite #110
Brentwood, TN 37027

Named in official capacity? ☒ Yes ☐ No
 Named in individual capacity? ☒ Yes ☐ No

2. Name of the second defendant: _____
 Place of employment of the second defendant: _____

 Second defendant's address: _____

Named in official capacity? ☐ Yes ☒ No
 Named in individual capacity? ☐ Yes ☒ No

(If there are more than two defendants against whom you are bringing this lawsuit, you must list on a separate sheet of paper the name of each additional defendant, his or her place of employment, address, and the capacity in which you are suing that defendant. If you do not provide the names of such additional defendants, they will not be included in your lawsuit. If you do not provide each defendant's proper name, place of employment, and address, the Clerk will be unable to serve that defendant should process issue.)

II. JURISDICTION

- A. Jurisdiction is asserted pursuant to 42 U.S.C. § 1983 (applies to state prisoners).
 Jurisdiction is also invoked pursuant to 28 U.S.C. § 1343(a)(3).

If you wish to assert jurisdiction under different or additional statutes, you may list them below:

III. PREVIOUS LAWSUITS (The following information must be provided by each plaintiff.)

A. Have you or any of the other plaintiffs in this lawsuit filed any other lawsuit(s) in the United States District Court for the Middle District of Tennessee, or in any other federal or state court? ☒ Yes ☐ No

B. If you checked the box marked "Yes" above, provide the following information:

1. Parties to the previous lawsuit:

Plaintiffs Mr. Jamie Bailey #00344857

Defendants Tiffany Williams, Logan Edwards, Bert Boyd
Tony C. Parker, Doctor Kevin Kelly

2. In what court did you file the previous lawsuit? United States
District Court (Middle District)
(If you filed the lawsuit in federal court, provide the name of the District. If you filed the lawsuit in state court, provide the name of the state and the county.)

3. What was the case number of the previous lawsuit? 3:24-cv-00133

4. What was the Judge's name to whom the case was assigned? Waverly D. Crenshaw Jr.

5. What type of case was it (for example, habeas corpus or civil rights action)?
Civil (Medical Malpractice)

6. When did you file the previous lawsuit? (Provide the year, if you do not know the exact date.) 2024

7. What was the result of the previous lawsuit? For example, was the case dismissed or appealed, or is it still pending? Still pending.

8. When was the previous lawsuit decided by the court? (Provide the year, if you do not know the exact date.) Still pending.

9. Did the circumstances of the prior lawsuit involve the same facts or circumstances that you are alleging in this lawsuit? ☐ Yes ☒ No

(If you have filed more than one prior lawsuit, list the additional lawsuit(s) on a separate sheet of paper, and provide the same information for the additional lawsuit(s).)

IV. EXHAUSTION

A. Are the facts of your lawsuit related to your present confinement?

☒ Yes ___ No

B. If you checked the box marked "No" in question III.B above, provide the name and address of the prison or jail to which the facts of this lawsuit pertain. _____

C. Do the facts of your lawsuit relate to your confinement in a Tennessee state prison?

☒ Yes ___ No

(If you checked the box marked "No," proceed to question IV.G. If you checked the box marked "Yes," proceed to question IV.D.)

D. Have you presented these facts to the prison authorities through the state grievance procedure? ___ Yes ___ No

E. If you checked the box marked "Yes" in question III.D above:

1. What steps did you take? Turned facts in to proper
individuals, filed Grievance,

2. What was the response of prison authorities? ~~Nothing~~ J.B.
~~Nothing~~

F. If you checked the box marked "No" in question IV.D above, explain why not. _____

G. Do the facts of your lawsuit pertain to your confinement in a detention facility operated by city or county law enforcement agencies (for example, city or county jail, workhouse, etc.)? ___ Yes ☒ No

H. If "Yes" to the question above, have you presented these facts to the authorities who operate the detention facility? ___ Yes ___ No

I. If you checked the box marked "Yes" in question III.H above:

1. What steps did you take? _____

2. What was the response of the authorities who run the detention facility? _____
None. I'm an inmate in prison.

J. If you checked the box marked "No" in question IV.H above, explain why not. _____
This took place while I was in prison.

V. CAUSE OF ACTION

Briefly explain which of your constitutional rights were violated:

Some of my personal property was stolen.

VI. STATEMENT OF FACTS

State the relevant facts of your case as briefly as possible. Include the dates when the incidents or events occurred, where they occurred, and how each defendant was involved. Be sure to include the names of other persons involved and the dates and places of their involvement.

If you set forth more than one claim, number each claim separately and set forth each claim in a separate paragraph. Attach additional sheets, if necessary. Use 8 ½ inch x 11 inch paper. Write on one side only, and leave a 1-inch margin on all 4 sides.

I was permanently transferred to Trowdale
Turner Correctional Center in the month of June of
2022. I ordered a Personal Property package from an
Approved vendor in the latter portion of the month
of June of 2022. I received said package in the
month of July of 2022, and the items which I
ordered, and received were stolen from out of
unit F-B-123, in the month of August of 2022.

VII. RELIEF REQUESTED: State exactly what you want the Court to order each defendant to do for you.

I would like for the total amount of the funds which I paid for Personal Property package (\$323.06) to be paid to me along with other cost or fees that I have as well as will have paid out or spent to be reimbursed to me, or that the items which were stolen from me, to be replaced. This Section 1983 is a Refile after the original was Dismissed without Prejudice over me not sending in the Filing Fee, nor an Informa Pauperis form, or paperwork.

I request a jury trial.

☐ Yes

☒ No

VIII. CERTIFICATION

I (we) certify under the penalty of perjury that the foregoing complaint is true to the best of my (our) information, knowledge and belief.

Signature:

Mr. Jamie Bailey

Date:

6-25-24

Prison Id. No.

00374857

Address (Include the city, state and zip code.):

Trousdale Turner Correctional Center, unit C-C-111-A, 140 Macon Way, Hartsville, TN 37074-2080.

Signature: _____

Date: _____

Prison Id. No. _____

Address (Include the city, state and zip code.): _____

ALL PLAINTIFFS MUST SIGN AND DATE THE COMPLAINT, and provide the information requested above. If there are more than two plaintiffs, attach a separate sheet of paper with their signatures, dates, prison identification numbers, and addresses.

ALL PLAINTIFFS MUST COMPLETE, SIGN, AND DATE SEPARATE APPLICATIONS TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES OR COSTS, if not paying the civil filing fee.

SUBMIT THE COMPLAINT AND (1) THE REQUIRED FILING FEE OR (2) COMPLETED APPLICATION TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES AND COSTS TOGETHER.

Complaints received without the required filing fee or application to proceed without prepayment of fees will be returned. Filing fees and applications to proceed without prepayment of fees submitted without a complaint will be returned.

On October 01, 2001, I committed three counts of First Degree Murder in Dyersburg, TN. During my arrest on the afternoon of said date, I was shot in my head with a nine millimeter pistol, which the bullet that I was shot with exited my head through the upper-center portion of my forehead. I was life-flighted from the Methodist Hospital of Dyersburg to the Regional Medical Center at Memphis. While I was at the Regional Medical Center at Memphis, I went through an operation which is a Bi-frontal Lepectomy whereas the remainder of the frontal lobes of my brain which were not blown out at said bullet's exit, some of my frontal lobes were also removed due to them having bone and gristle fragments in them. Before the conclusion of that operation, a Titanium Mesh plate was placed into my head to serve the same purpose as my skull served. I spent thirty months in Maximum Security in the Oyer County Jail, after which time I was transferred to Classification at West Tennessee State Penitentiary (W.T.S.P.) for thirty four days, then I was transferred to Northwest Correctional Complex where I remained for seven days, and then I was transferred back to W.T.S.P. from there I was transferred to Turney Center Industrial Prison and Farm (T.C.I.P.) where an infection and an abscess appeared between the plate in my head and my brain which made it so where the Titanium Mesh plate had to be removed. That took place in the month of September of 2009. Since that took place, two very hard plastic plates have been surgically placed back into my head to me avail. I am filing for this Medical Surlough with regards to the high cost which these brain surgeries are costing the state of Tennessee. I have served, as of October 09, 24, twenty four years of a fifty-one year sentence and I feel that with the amount of time which I have served as well as with my negative health conditions, that I should be released to Hospice, who will be responsible for me, and they will as well, provide housing for me. I am from West Tennessee, and therefore I would like to be housed in West Tennessee, so that I will be closer to my hometown, and my family. I have two grown daughters as well as fifteen grandchildren who can need my financial help, as soon as I can get that means of financial aid to them.

Mr. Jamie vBailey #00374857
T.T.C.C. unit C-C-111-A
Hartsville, TN
37074-2080

NASHVILLE TN 370
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OCT 23 2024

U.S. District Court
Middle District of TN

Clerk U.S. District Court
Fred Thompson Crthse.
719 Church St. Suite # 1300
Nashville, TN
37203-0719

37203-708525

